

1 D. Douglas Grubbs (*Admitted PHV*)  
Adam K. Pulaski (*Admitted PHV*)  
2 **PULASKI KHERKHER, PLLC**  
2925 Richmond Avenue, Ste 1725  
3 Houston, TX 77098  
Telephone: 713-664-4555  
4 Facsimile: 713-664-7543  
Email: [dgrubbs@pulaskilawfirm.com](mailto:dgrubbs@pulaskilawfirm.com)  
5 Email: [adam@pulaskilawfirm.com](mailto:adam@pulaskilawfirm.com)

6 *Counsel for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

9 IN RE: UBER TECHNOLOGIES, INC.,  
10 PASSENGER SEXUAL ASSAULT  
11 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

12 This Document Relates to:

13 *T.K. v. Uber Technologies, Inc., et al.*,  
14 No. 3:25-cv-01651-CRB;

15 *T.C. v. Uber Technologies, Inc., et al.*,  
16 No. 3:25-cv-02109-CRB;

17 *A.J. v. Uber Technologies, Inc., et al.*,  
18 No. 3:25-cv-02577-CRB;

19 *N.K. v. Uber Technologies, Inc., et al.*,  
20 No. 3:25-cv-02681-CRB;

21 *S.F. v. Uber Technologies, Inc., et al.*,  
22 No. 3:25-cv-02708-CRB;

23 *T.P. v. Uber Technologies, Inc., et al.*,  
24 No. 3:25-cv-03016-CRB;

25 *M.H. v. Uber Technologies, Inc., et al.*,  
No. 3:25-cv-02859-CRB;

**DECLARATION OF D. DOUGLAS  
GRUBBS IN RESPONSE TO THE  
COURT'S SEPTEMBER 16, 2025  
ORDER [ECF 3922]**

26 I, Donald Douglas Grubbs, declare:

27 1. I am an attorney with the law firm of Pulaski Kherkher, PLLC. I am a member of the  
28 State Bar of Texas and am admitted to practice *pro hac vice* before this Court. I make this

1 declaration based on my own personal knowledge. If called upon to testify, I could and would  
 2 testify competently to the truth of the matters stated herein.

3 2. Pursuant to the Court's September 16, 2025 Order [ECF 3922], the above-referenced  
 4 Plaintiffs disagree with their inclusion in Uber's declaration [ECF 4072].

5 3. The above-referenced Plaintiffs submitted a substantially complete and verified  
 6 Plaintiff Fact Sheet (including exhibits) on the following dates:  
 7

8 MDLC ID	DATE OF PRODUCTION
9 2973	10/13/25 - PFS Exhibit A
10 3047	10/13/25 - PFS Exhibit A 7/25/25 - PFS Exhibit B
11 3099	10/13/25 - PFS Exhibit B
12 3126	10/13/25 - PFS Exhibit A
13 3131	10/13/25 - PFS Exhibits A & B
14 3213	10/13/25 - PFS Exhibit B & C
15 3182	10/13/25 - Amended PFS 15.a.

16 I declare under penalty of perjury that the foregoing is true and correct, and that this  
 17 declaration was executed on October 13, 2025 in Houston, Texas.  
 18

19  
 20  
 21  
 22  
 23 /s/ D. Douglas Grubbs

24 D. Douglas Grubbs  
 25  
 26  
 27  
 28

**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2025, I electronically transmitted the foregoing DECLARATION OF D. DOUGLAS GRUBBS IN RESPONSE TO THE COURT'S SEPTEMBER 16, 2025 ORDER [ECF 3922] to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs